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SUBJECT: Forwards "Nine Mile Point Unit 2 EALs Rev Based on NUMARC NESP-007." Upgrade project involved listed plants.

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NIAGARA MOHAWK

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July 11, 1994
NMP2L 1482

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Nine Mile Point Nuclear Power Station Unit 2
Docket No. 50-410
License No. NPF-69

SUBJECT: Nine Mile Point Unit 2 Emergency Action Levels Revision Based on NUMARC NESP-007

In accordance with the guidance provided by the NRC staff at recent NEI meetings, Niagara Mohawk is submitting for review and approval the enclosed Emergency Action Levels (EALs) for Nine Mile Point Nuclear Station Unit 2. Niagara Mohawk, in accordance with 10CFR50.54 (q), has reviewed these EALs and determined that they represent an enhancement to the Nine Mile Point Emergency Plan. The EALs have been revised consistent with the NUMARC NESP-007 methodology, and were developed as part of a joint project with all nuclear utilities within New York State. In order to assist your review we have included a number of developmental documents in the enclosed EAL Generation Package.

The EAL Generation Package consists of the following:

- Plant-Specific EAL Guideline
- Fission Product Barrier Evaluation
- EAL Binning Document
- EAL Technical Bases
- Emergency Action Level Matrix
- Validation and Verification Report

Attachment 1 provides an explanation of the contents of the EAL Generation Package.

These EALs were developed as a joint project with the New York Power Authority, Consolidated Edison, Rochester Gas and Electric, and Niagara Mohawk. This process ensures consistent emergency classification between all New York State nuclear utilities to the greatest extent possible, limited only by plant design differences. We believe that a coordinated review of all the New York State nuclear utility EAL revisions will promote this consistency and will result in the most advantageous use of time and resources.

Please contact Ms. Coleen Ware, Director of Emergency Preparedness, at 349-2066 should you have any questions or require additional information regarding this matter.

Very truly yours,

Martin J. McCormick, Jr.
Vice President-Nuclear Safety
Assessment and Support

MJM/JDJ/bh

cc: Mr. B. S. Norris, Senior Resident Inspector
Mr. M. L. Boyle, Acting Director, Project Directorate I-1, NRR
Mr. D. S. Brinkman, Sr. Project Manager, NRR
Mr. T. T. Martin, Regional Administrator, Region 1

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ATTACHMENT 1

NINE MILE POINT NUCLEAR STATION UNIT 2

EAL GENERATION PACKAGE

CONTENT SUMMARY

INTRODUCTION

Prior to the acceptance by the NRC of NUMARC/NESP-007 "Methodology for Development of Emergency Action Levels" as an acceptable alternative to the NUREG 0654 EAL guidance, the four nuclear utilities in the State of New York decided to perform a joint implementation of the new methodology. This upgrade project involved the following plants:

- Nine Mile Point Unit 1 (NMP1) - Niagara Mohawk Power Corporation
- Nine Mile Point Unit 2 (NMP2) - Niagara Mohawk Power Corporation
- James A. FitzPatrick Nuclear Power Plant - New York Power Authority
- Indian Point Station 2 - Consolidated Edison
- Indian Point 3 Nuclear Power Station- New York Power Authority
- R. E. Ginna Nuclear Power Station - Rochester Gas and Electric

While the resulting upgraded EALs are site specific, an objective of the upgrade project was to ensure conformity and consistency between the sites to the extent possible.

The following paragraphs describe the site specific EAL developmental documents which are included in the EAL review package.

NMP2 Plant-Specific EAL Guideline (PEG)

The PEG is the NMP2 Interpretation of the NUMARC methodology for developing EALs. The PEG identifies deletions from the NUMARC methodology by striking out words and phrases that are not applicable, additions are identified by underlining new words and phrases. The documents which provide the basis for these changes from NUMARC methodology are listed in the references section of the PEG.

NMP2 Fission Product Barrier Evaluation (FPBE)

The FPBE contains the evaluation of the NUMARC example EALs for each of the three fission product barriers. The result of this evaluation is a discrete set of quantifiable EALs which represent the NUMARC fission product barrier loss matrices.

Based on the number of example EALs, and the number of loss and potential loss conditions, the set of conditions that can yield a given emergency classification can be determined. An evaluation of each condition or set of conditions was made to determine if it properly defines the appropriate threshold for the classification. If a condition or set of conditions was appropriate, a comment reflecting this conclusion was recorded in this document. If a condition or set of conditions is determined to be inappropriate, it is lined out and the reason for this conclusion is similarly recorded.

NMP2 EAL Binning Document

Since the format presented in NUMARC/NESP-007 is inadequate for implementation, the EALs defined by the PEG and FPBE must be binned into categories and subcategories which support ease of use. The binning document identifies where each PEG/FPBE Initiating Conditions (IC) is addressed within the presentation scheme.

NMP2 EAL Technical Bases Document

The EAL Technical Bases Document provides an explanation and rationale for each of the emergency action level (EALs) included in the EAL Upgrade Program. It is also intended to facilitate the review process of the NMP2 EALs and provide historical documentation for future reference. This document is also intended to be used by those individuals responsible for implementation of the NMP2 classification procedure as a technical reference and aid in EAL interpretation.

NMP2 Emergency Action Level Matrix

The Emergency Action Level Matrix is the user level result of the EAL development project. This matrix will be incorporated in the Emergency Plan Implementing Procedures and is used directly by operations personnel to classify an event.

NMP2 Verification and Validation Report

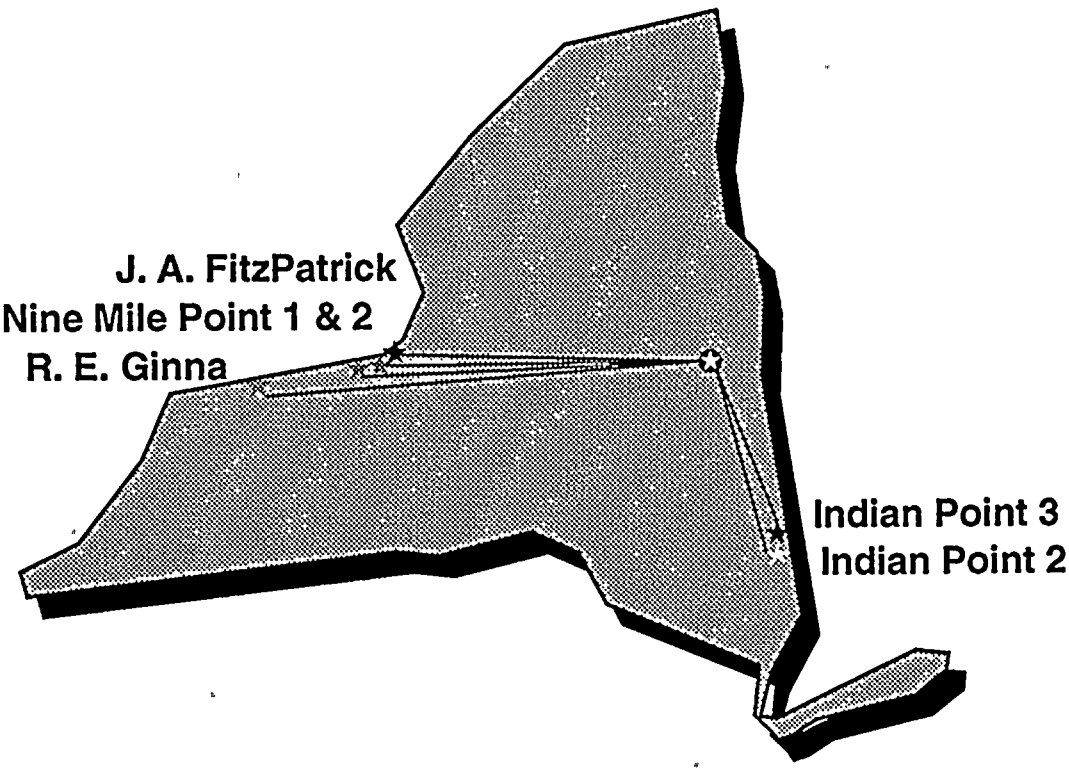
The NMP2 Verification and Validation Report documents the process conducted to verify and to validate the site specific EALs and supporting documentation. This document also includes the comments received during validation along with comment resolutions.

The verification process was performed to ensure the NMP2 EALs and classification procedures are technically correct. The NMP2 EAL verification was conducted prior to the EAL validation exercises. The technical accuracy of the upgraded EALs were verified through tabletop reviews.

The validation process ensures that the NMP2 EALs and classification procedures are usable and correct, and ensures that emergency response personnel are able to arrive at consistent interpretations of EALs under similar conditions. The EALs were validated through observation of emergency response organization personnel responding to simulated emergency events. The group of EALs selected for validation were sufficiently representative of all the EALs.

OSSI 93-402A-10-NMP2

New York State Emergency Action Level Upgrade Project



Niagara Mohawk Power Corporation

Nine Mile Point Unit 2

EAL Generation Package

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